

1 Chief Judge Marc Barreca
2 Chapter 11
3 Hearing: March 23, 2022 @ 10:00 a.m.
4 Response Date: March 16, 2022
5 ZOOMGOV

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7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON AT EVERETT
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10 In re: No. 18-14536-MLB
11 TIMOTHY DONALD EYMAN, DECLARATION OF KATHRYN
12 Debtor. SCORDATO IN SUPPORT OF FINAL
13 APPLICATION FOR COMPENSATION
14 FOR VORTMAN & FEINSTEIN FOR
15 APRIL 8, 2020, TO DECEMBER 17,
16 2021

17 I, Kathryn P. Scordato, declare as follows:

18 I am an attorney with the firm of Vortman & Feinstein. In my capacity as an
19 attorney, I am responsible for maintaining the records for work completed on a
20 client's behalf. Larry Feinstein originally notes his time by handwriting slips with
21 the date, amount of time, and a brief description. Vicki Carleton (a contract attorney
22 for the firm) submits typewritten time records. I prefer to enter my time directly into
23 the software simultaneously with the work. Each month, I produce invoices and
24 reports for Mr. Feinstein to review, which are then sent to the Chapter 11 clients
for information purposes only. Payments received from a client or third parties are
noted in these invoices and reports as well. For all Chapter 11 clients,
preconfirmation funds are held in Trust unless and until there is a court order
authorizing application of the funds to the outstanding balance. Post-confirmation,

1 payments received from a client or third-party are noted on the invoice and applied
2 to the outstanding balance, pursuant to the terms of the confirmed Plan.

3 The hourly rate for Mr. Feinstein is \$425.00; my hourly rate is \$350.00, the
4 hourly rate for Ms. Carleton¹ is \$150.00; and the hourly rate for administrative
5 services is \$95.00. Attached hereto and made a part hereof by reference (A) a
6 breakdown of services by category and (B) an itemized billing statement by date
7 showing the services through from April 8, 2020, through December 17, 2021.

8 A summary is as follows:

A. BR 2004 Exam of Karen Eyman and Carol Williams	1.5 hours
B. Administration, including telephone calls and emails with the client, and other general case matters	4.2 hours
C. Adversary Proceeding No. 21-01041 – State of WA v. Eyman, V&F, and GLG	11.2 hours
D. Previous fee request and Motion for Final Decree (Closing case)	2.7 hours
E. Assistance in purging contempt in state court case	1.5 hours
F. State's Motion to Appoint Trustee and Motion to Convert from Ch 11 to Chapter 7	11.1 hours
G. Negotiations with Karen Eyman regarding dissolution and purchase of estate's interest in the house	12.2 hours
H. Preparation and review of the U.S. Trustee monthly and quarterly reports	6.8 hours
I. State's Motion for Relief from Stay	8.3 hours
J. Finalization of Plan of Reorganization and answering Client's questions regarding implementation	3.0 hours
Total Time Billed	65.5 hours
Dollar Amount of Time Billed	\$23,262.50
Expenses	\$129.60
Additional Time for Preparation of this Application	3.0 hours
Additional Compensation for Preparation of this Application	\$1,050.00
Payments made post-confirmation by Debtor	(\$15,838.65)
Voluntary Discount per LBF	(\$490.95)
Administrative Expense Claim Against Ch 7 Estate	\$8,112.50

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23 ¹ Vicki Carleton is a contract attorney engaged by the firm on an as needed basis, primarily to handle adversary litigation.

1 In addition to the time noted in the billing statements, we are requesting an
2 additional 3.0 hours at \$350.00 for preparation of this Application, this Declaration,
3 the proposed Order and attending any hearing that might be required herein. On
4 February 23, 2022, I spent 1.8 hours finalizing the timeslip entries to correct typos
5 and categorizing entries to prepare Exhibit A. I spent an additional 2.5 hours
6 drafting the Application for fees that day. On February 25, 2022, I spent another
7 1.2 hours drafting this Declaration and the proposed order, after reviewing and
8 editing the Application and spreadsheet again. The total time spent on this
9 Application was 5.5 hours. We are voluntarily reducing and capping that time 3.0
10 hours, which discounts the services by \$875, for a total requested additional fee of
11 \$1,050.00.

12 With the above, then, the outstanding unpaid balance as of December 17,
13 2021, the date of conversion to Chapter 7, is \$8,112.50.

14 I declare under penalty of perjury under the laws of the United States of
15 America that the foregoing is true and correct.

16 Dated this 25th day of February, 2022.

17 /s/ Kathryn P. Scordato
18 Larry B. Feinstein, WSBA #6074
Kathryn P. Scordato, WSBA #41922
Attorney for Debtor
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